

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN  
MILWAUKEE DIVISION**

XU LUN, a pseudonym,

Plaintiff,

v.

MILWAUKEE ELECTRIC TOOL  
CORPORATION, and  
TECHTRONIC INDUSTRIES  
COMPANY LIMITED,

Defendants.

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Case No. 2:24-cv-00803

**JOINT STIPULATION FOR EXTENSION OF TIME FOR DEFENDANTS TO  
RESPOND TO COMPLAINT AND FOR BRIEFING SCHEDULE**

Plaintiff Xu Lun and Defendants Milwaukee Electric Tool Corporation and Techtronic Industries Company Limited (collectively, the “Parties”), by and through their respective attorneys of record, hereby stipulated and agree as follows:

1. The Parties agree that the time for Defendants to file and serve their responses to Plaintiff’s Complaint is extended up to and including September 13, 2024.

2. The Parties agree to the following briefing schedule for any Motions to Dismiss filed by Defendants in response to Plaintiff’s Complaint:

a. Plaintiff shall file and serve his Opposition(s) to any Motions to Dismiss filed by Defendants on or before October 14, 2024.

b. Defendants shall file and serve their Reply Briefs on or before November 4, 2024.

3. This extension is sought for good cause, including to set common deadlines for the Defendants to respond to the Complaint and a common briefing schedule, which will promote efficiency by allowing the parties to streamline their presentation of issues to the Court.

4. The Parties make this stipulation solely for efficiency purposes and no party will experience prejudice as a result of the relief sought by this motion. This stipulation shall not be construed to waive any claims, rights, or defenses of the parties, including, but not limited to, any claim or defense based on the lack of personal jurisdiction.

5. The Parties respectfully request that the Court enter the attached proposed order setting the requested deadlines.

Signature blocks follow on next page.

Dated: August 15, 2024

/s/ Times Wang

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***Attorneys for Defendant Milwaukee Electric  
Tool Corporation***

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 15<sup>th</sup> day of August, 2024, I filed the foregoing document and caused the same to be served on all counsel of record via the Court's CM/ECF system, and all counsel for the parties directly via email.

/s/ Paul J. Stockhausen

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